

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	CRIMINAL DOCKET NO. 09-152
<b>v.</b>	*	SECTION: J (5)
<b>OBIALUNAMMA AGUBUZU</b>	*	VIOLATION: 18 U.S.C. § 1097 (a)
	* * *	

**FACTUAL BASIS**

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant, OBIALUNAMMA AGUBUZU. The Defendant has agreed to plead guilty to Count Six of the Indictment alleging that she knowingly and willfully obtained by fraud and false statement, funds in the amount of \$35,572 provided from loans under the Federal Family Education Loan Program which is administered by the United States Department of Education in violation of 20 U.S.C. § 1097(a).

On or about November 28, 2007, AGUBUZU applied to Louisiana State University Health Sciences Center - New Orleans, School of Dentistry, claiming to be a resident of Louisiana and to have taken the Dental Admission Test in January 2006 at Cornell University.

As part of the admission process, AGUBUZU submitted or caused to be submitted to LSU School of Dentistry, a Dental Admission Test Score Report allegedly issued by the American Dental Association Department of Testing Services located in Chicago, Illinois. The Dental Admission Test Score Report submitted on behalf of AGUBUZU stated that she had received an overall Academic Average of 19 and scored in the 77.6 percentile. On or before May 6, 2009, LSU School of Dentistry determined that AGUBUZU had not taken the Dental Admission Test administered by the American Dental Association and the Dental Admission Test Score Report submitted to LSU School of Dentistry on behalf of AGUBUZU was in fact a forgery.

Included in AGUBUZU's application for admission to the LSU School of Dentistry was a false and fraudulent copy of AGUBUZU's undergraduate transcript from Cornell University indicating that AGUBUZU had taken the prerequisite science courses required for Dental School Admission and had received a 4.0 grade point average. On or about May 1, 2009 LSU School of Dentistry learned from Cornell University that the undergraduate transcript submitted by or on behalf of AGUBUZU was a forgery. The Cornell University Office of the University Registrar provided to LSU School of Dentistry AGUBUZU's true and accurate undergraduate transcript which stated that AGUBUZU graduated from Cornell University on May 27, 2007 with a Bachelor of Science Degree in Communication and Agriculture and Life Sciences with a 2.452 grade point average. None of the prerequisite science courses required for admission to LSU Dental School were taken by AGUBUZU.

On or about May 7, 2009, Special Agent Marcus Culpepper of the United States Department of Education, Office of Inspector General, was notified by LSU School of Dentistry that AGUBUZU had submitted a false undergraduate transcript from Cornell University and a forged Dental Admission Test Score Report from the American Dental Association as part of

AGUBUZU's application for admission. As a result of submitting the false documentation, AGUBUZU obtained admission to LSU School of Dentistry.

After AGUBUZU was admitted to the LSU School of Dentistry, AGUBUZU applied for Federal Financial aid under the Higher Education Act. On or about August 4, 2008, in the Eastern District of Louisiana, AGUBUZU received funds in the amount of \$35,572 provided from loans under the Federal Family Education Loan Program as well as two private scholarships, \$2,000 and \$6,000 for a total of \$43,572 in financial aid. AGUBUZU received \$21,187 for living expenses out of the \$42,572 she received in financial aid.

Both the Government and the defendant, OBIANLUNAMMA AGUBUZU, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

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JULIA K. EVANS (D.C. BAR # 435461)  
ASSISTANT UNITED STATES ATTORNEY

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OBIANLUNAMMA AGUBUZU  
(DEFENDANT) (DATE)

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CYNTHIA CIMINO, ESQUIRE (DATE)  
FEDERAL PUBLIC DEFENDER,  
COUNSEL FOR DEFENDANT \_\_\_\_\_